

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X)	
STEPHANIE JONES,)	
)	
Plaintiff,)	Case No. 1:19-cv-11573
)	
v.)	Motion to Dismiss Plaintiff's
)	Complaint
FOX ROTHSCHILD LLP and)	
IAN W. SIMINOFF,)	
)	
Defendants.)	
-----X		

**DEFENDANT IAN W. SIMINOFF'S NOTICE OF MOTION TO DISMISS THE
COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Defendant Ian W. Siminoff will move this Court before the Honorable Alvin K. Hellerstein, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14D, New York, New York 10007, at a date and time to be set by the Court, for an order dismissing all of Plaintiff's claims as against Mr. Siminoff, with prejudice, pursuant to Rules 12(b)(1), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure because (i) there is no individual liability under Title VII of the Civil Rights Act of 1964; (ii) Plaintiff did not experience any discriminatory impact in New York City or State, and therefore, there is no jurisdiction for her claims under the New York State Human Rights Law or New York City Human Rights Law; (iii) Plaintiff's claim under the New Jersey Law Against Discrimination is time-barred; (iv) Plaintiff's common-law tort claims are time-barred

and/or barred under the New York and New Jersey workers' compensation laws; and
(v) the Southern District of New York is not the proper venue for this action.

Mr. Siminoff respectfully requests oral argument of this motion.

Dated: New York, New York
February 15, 2020

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